

JAP:TH

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(21 U.S.C. §§ 952(a) and 960)

SCHNEIDER AUGUSTIN,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

ROBERT BASILE, being duly sworn, deposes and states that he is an Special Agent with the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

On or about December 12, 2015, within the Eastern District of New York and elsewhere, the defendant SCHNEIDER AUGUSTIN did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Section 952(a) and 960)

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am an Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI") and have been involved in the

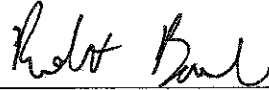
¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

investigation of numerous cases involving the importation of narcotics, including cocaine, into the United States. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant's criminal history record; and from reports of other law enforcement officers involved in the investigation.

2. On or about December 12, 2015, the defendant SCHNEIDER AUGUSTIN at John F. Kennedy Airport ("JFK") in Queens, New York aboard JetBlue Flight No. 1834 from Port-au-Prince, Haiti.

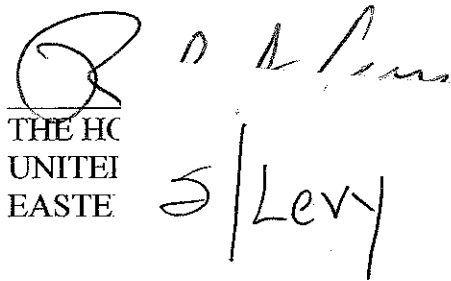
3. Upon her arrival at JFK, the defendant SCHNEIDER AUGUSTIN was selected for an enforcement examination by United States Customs and Border Protection ("CBP") officers. The defendant presented a green carry-on suitcase, one purse, and one checked purple suitcase. AUGUSTIN stated that the baggage in her possession was hers and that she had packed them herself, but that her cousin had packed pots into the purple suitcase to bring to the United States for someone else. CBP examined the purple suitcase and observed six metal pots wrapped in newspaper. When the pots were drilled, CBP officers discovered a white powdery substance which field-tested positive for the presence of cocaine. The total approximate gross weight of cocaine recovered from the pots was 14.146 kilograms.

WHEREFORE, your deponent respectfully requests that the defendant
SCHNEIDER AUGUSTIN, be dealt with according to law.



ROBERT BASILE
Special Agent, United States Department of
Homeland Security, Homeland Security
Investigations

Sworn to before me this
14 day of December, 2015



THE HC
UNITED
EAST

LEVY
JUDGE
DRK